

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

PAMELA S. PALACIOS,

Magistrate Case No. 08 MJ 1448

COMPLAINT FOR VIOLATION OF:

18 U.S.C. 656 (Misdemeanor)

Misapplication of Funds

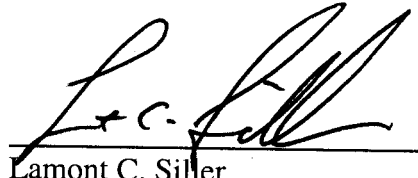
By Bank Employee

The undersigned complainant, being duly sworn, states:

COUNT ONE

That during the period March 6, 2006 to February 7, 2007, within the Southern District of California, Defendant Pamela S. Palacios, being an employee of San Diego Firefighters Federal Credit Union, the deposits of which were then insured by the National Credit Union Administration, with intent to injure and defraud, did knowingly and willfully embezzle, abstract, purloin, and willfully misapply the monies, funds, and credits entrusted to the care and custody of said credit union, and under the care, custody, and control of the defendant as such employee; in violation of Title 18, United States Code, Section 656, a Misdemeanor.

And the complainant further states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.



Lamont C. Siller
Special Agent
Federal Bureau of Investigation

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE THIS 24 DAY OF April 2008.


UNITED STATES MAGISTRATE JUDGE

AFFIDAVIT

STATE OF CALIFORNIA)

) ss.

COUNTY OF SAN DIEGO)

I, Lamont C. Siller, being first duly sworn, depose and say:

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI) United States Department of Justice. I am presently assigned to the San Diego Division of the FBI. I am a graduate of the FBI Academy in Quantico, Virginia, and have been assigned to investigate white-collar crime matters. As a result of my experience, training and discussion with other agents, I have become familiar with the methods utilized by individuals violating and attempting to violate, the laws of the United States through illegal or fraudulent financial transactions.

2. San Diego Firefighters Federal Credit Union (SDFCU), 10509 San Diego Mission Road, #A, San Diego, California, was regulated by the National Credit Union Administration at the time the events herein described occurred.

3. Pursuant to a telephone call from SDFCU, from approximately March 6, 2006 to February 7, 2007, SDFCU employee Pamela Palacios fraudulently made 18 unauthorized withdrawals, in increments of \$500, for a total of \$9,000 in cash from the account of SDFCU member Daryl Andrews.

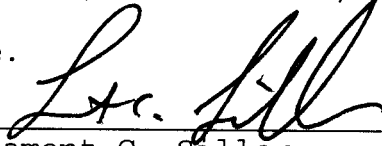
1 4. Palacios subsequently admitted to investigators
2 at SDFCU that she stole the aforementioned money from
3 Andrews' account.

4 5. On February 15, 2007, Palacios wrote a total of
5 three confession letters to SDFCU Board Members, employees at
6 SDFCU and Andrews, admitting responsibility for the theft.
7 Palacios blamed her actions on her gambling addiction. A
8 copy of these letters are attached and incorporated to this
9 affidavit. In addition, Palacios subsequently reimbursed
10 SDFCU for the total loss.

11 6. Additionally, on June 6, 2007 the Affiant
12 interviewed Palacios at the San Diego Division of the FBI,
13 located at 9797 Aero Drive, San Diego. During that
14 interview, Palacios voluntarily admitted to her
15 aforementioned theft. Palacios also hand wrote a two page
16 statement, in the presence of the Affiant, which detailed her
17 involvement in the theft of \$9,000 from the SDFCU. A copy of
18 her two page statement is attached and incorporated to this
19 affidavit.

20 7. During the time of the theft, Palacios held the
21 position of Member Service Representative Teller for SDFCU,
22 and resided in El Cajon, California.
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1 8. Based upon the facts summarized above, it is
2 the opinion of the Affiant that probable cause exists to
3 issue a Notice To Appear for Pamela Palacios, for violation
4 of Title 18, United States Code, Section 656, Misapplication
5 of Funds by a Bank Employee.

6 
7 Lamont C. Siller
8 Special Agent
9 Federal Bureau of Investigation
10 San Diego, California

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12 Subscribed and sworn to before me this 24th day of April,
13 2008.

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15 United States Magistrate Judge
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Feb 15, 2007

To the Board Members at San Diego firefighters:
J.J., Rick, Pea, Lyn, Gayle, Ron, Howard, Doug
and anyone else I fail to mention -

This letter is to express my sincere
apologies to you personally and as a whole
group.

As you know by now, I stole money from
the credit union by debiting Mr. Doryl Andrews
account. I have to face what I've
done and I can make no excuses. The
only thing I can tell you all is that I
have a serious gambling addiction that I
will be getting help for. With the
love and support of my amazing husband,
children and parents I will get the help
that I need. I don't regret that this
all is happening because I've been lying,
lying and scheming to everyone in my
life including myself.

I do regret hurting the reputation of the credit
union and hurting my co-workers. I have
much repair work to do in my life. For
nearly 4 years I worked for the credit union
and I loved it. The last six months have
been filled with anxiety and guilt. Again,
with my whole heart I apologize and ask for
everyone's forgiveness. I'll miss you all.

Jan Salas

Feb 15, 2007

To Sue, Myrna, Sabrina, Mari, Ed, Jojo, Porlita, Tracy, Eva
Susie, Gary, Julie, Kathleen

This is a difficult letter to write ~ I'm
going to miss seeing you & working with you.
We were like a little family and like
all families sometimes we had problems.
I have a huge problem that has finally
surfaced and I have a lot of tough
battles to face. But with encouragement
and support from my parents, my dogs
and my husband I'm going to get through
this.

I'm so sorry for damaging each of you
and our department. I'm also so sorry
for hurting the reputation of the credit
union.

Be there for each other & please forgive
me. I don't know what the future is
but I know that the nearly 4 years I
worked with you (except Sabrina - nearly 1 year)
have been some of the best times of my
life. The last 6 months I've been
living a secret life though. I've been
out of control in my gambling that I hid
from everybody. I'm filled with shame
and regret. As strange as it sounds though,
it's a good thing because now I can get the
help I need. I'm sorry for the extra work
I've caused. You all have a place in my
heart.
Signed, Pam

2-15-07

Dear Mr. Andrews,

As you know by now, there have been many withdrawals on your account that weren't authorized by you or your daughter. ~~I'm so sorry~~ for the damage and betrayal that I have done to you. I am replacing every cent that I stole from you. I can make no excuses and have to face the consequences of my actions. I'm sure you're wondering why - why me? Mr. Andrews, I have a serious gambling addiction that with the loving support of my family and my parents I'm going to get the help that I need. I'm so sorry for the hurt and distress this is causing you. I'm asking for your forgiveness and please don't judge the credit union or my co-workers - they had no idea, of course. You were always cheerful and nice and I am filled with shame for what I've done.

Again, my whole-hearted apologies to you and your daughter.

Sincerely,
Sam Palam

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June 6, 2007
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June 6, 2007
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in the amounts of \$500 each. I believe
the total was \$9000. I have paid back
all the funds, and did so as soon as
I knew what the amount was.

I am so extremely sorry this event took
place. I am in recovery now for compulsive
gambling and I will never do anything like
this ever again. As a mother of three nearly
grown boys, the guilt and shame of this
is very difficult.

I wrote apology letters to the victim, the
Board of Directors, and my fellow employees
for my actions. And I am truly sorry
to all who are involved.

Danella S. Salas

Lamont C. Silb, FBI

SA Lamont C. Silb

Carol P. Harman FBI

Carol P. Harman